

# EXHIBIT F

## Jason Mizrahi

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**From:** Jason Mizrahi  
**Sent:** Tuesday, November 17, 2020 11:19 AM  
**To:** Rhonda Wills; Barry Slotnick; nweingarten@loeb.com  
**Cc:** Joshua Levin-Epstein  
**Subject:** RE: The Pullman Group, LLC v. Isley et al [20-cv-07293]  
**Attachments:** 2020-1117 Rule 26(a) Initial Disclosures.pdf

Counsel,

Good morning. This office is counsel to Plaintiff The Pullman Group, LLC in the above-referenced action.

I understand that one or more of you were not able to open the.pdf attached to my previous email. Out of an abundance of caution, we are re-forwarding the .pdf, and also including it in the DropBox, which can be accessed via the link below.

Attached hereto, please find:

1. Plaintiff 's Rule 26(a) Initial Disclosures;
2. A courtesy link to the DropBox folder containing Plaintiff's bate-stamped document production

<https://www.dropbox.com/sh/h4zexc9hruu6jx6/AAARrcORK-xfS-2SBsQIIPepa?dl=0>

Thank You,

Jason Mizrahi

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
Facsimile: (646) 786-3170  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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---

**From:** Jason Mizrahi  
**Sent:** Tuesday, November 17, 2020 10:38 AM  
**To:** Rhonda Wills <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)>; Barry Slotnick <[bslotnick@loeb.com](mailto:bslotnick@loeb.com)>; nweingarten@loeb.com  
**Cc:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Subject:** The Pullman Group, LLC v. Isley et al [20-cv-07293]

Counsel,

Good morning. This office is counsel to Plaintiff The Pullman Group, LLC in the above-referenced action.

Attached hereto, please find:

1. Plaintiff's Rule 26(a) Initial Disclosures;
2. A courtesy link to the DropBox folder containing Plaintiff's bate-stamped document production

<https://www.dropbox.com/sh/h4zexc9hruu6jx6/AAARrcORK-xfS-2SBsQIIPepa?dl=0>

Thank You,

Jason Mizrahi

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New York, NY 10170  
Phone: (212) 792-0048  
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## Jason Mizrahi

---

**From:** Jason Mizrahi  
**Sent:** Tuesday, December 22, 2020 11:55 AM  
**To:** Rhonda Wills  
**Cc:** Joshua Levin-Epstein; Barry Slotnick; nweingarten@loeb.com  
**Subject:** The Pullman Group, LLC v. Isley et al [20-cv-07293]  
**Attachments:** 2020-1222 Notice of Deposition [T-Neck Records, Inc.].pdf; 2020-1222 Notice of Deposition [Triple Three Music, Inc.].pdf; 2020-1222 Notice of Deposition [Bovina].pdf; 2020-1222 Notice of Deposition [Estate].pdf; 2020-1222 Notice of Deposition [Isley Brothers, LLC].pdf; 2020-1222 Notice of Deposition [Ronald Isley].pdf; 2020-1222 Notice of Deposition [Royalty Venture].pdf; 2020-1222 Notice of Deposition [Rudolph Isley].pdf; 2020-1222 Notice of Deposition [Three Boys].pdf; 2020-1222 Rogs [Isley Def.].pdf; 2020-1222 FRPD [Isley Def.].pdf

Counsel,

Good morning. This office is counsel to Plaintiff The Pullman Group, LLC in the above-referenced action.

Attached hereto, please find:

1. Plaintiff's First Set of Interrogatories to the Isley Defendants;
2. Plaintiff's First Request for the Production of Documents to the Isley Defendants;
3. A Notice of Deposition for Defendant Ronald Isley;
4. A Notice of Deposition for Defendant Rudolph Isley;
5. A Notice of Deposition for the corporate representative of Defendant The Estate of O'Kelly Isley, J.R. with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
6. A Notice of Deposition for the corporate representative of Defendant Isley Brothers, L.L.C. with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
7. A Notice of Deposition for the corporate representative of Defendant Isley Brothers Royalty Venture I SPC, Inc. with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
8. A Notice of Deposition for the corporate representative of Defendant Three Boys Music Corporation with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
9. A Notice of Deposition for the corporate representative of Defendant Bovina Music Inc. with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
10. A Notice of Deposition for the corporate representative of Defendant T-Neck Records, Inc. with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
11. A Notice of Deposition for the corporate representative of Defendant Triple Three Music, Inc. with the most knowledge of the facts pled in Plaintiff's Amended Complaint;
12. A courtesy link to the DropBox folder containing Plaintiff's first set of discovery requests, as to the Isley Defendants

[https://www.dropbox.com/sh/u31jw37iipq2qu/AABrHcQDU\\_kZe59tXdj5KSsRa?dl=0](https://www.dropbox.com/sh/u31jw37iipq2qu/AABrHcQDU_kZe59tXdj5KSsRa?dl=0)

Thank You,

Jason Mizrahi

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
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**Jason Mizrahi**

---

**From:** Jason Mizrahi  
**Sent:** Tuesday, February 16, 2021 4:12 PM  
**To:** Rhonda Wills; praspino@rwillslawfirm.com  
**Cc:** Joshua Levin-Epstein; Barry Slotnick; nweingarten@loeb.com  
**Subject:** The Pullman Group, LLC v. Isley et al [20-cv-07293] - Deficiency Letter [Isley Defendants]  
**Attachments:** 2021-0216 Deficiency Letter [To Isley Def.].pdf

Counsel,

This office represents Plaintiff The Pullman Group, LLC in the above-referenced matter.

On behalf of Plaintiff, annexed hereto please find:

1. A deficiency letter, regarding the Isley Defendants' responses and objections to Plaintiff's First Set of Discovery Requests.

Respectfully,

Jason Mizrahi

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Ave., Suite 2525  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
Facsimile: (646) 786-3170  
Email: [Jason@levinepstein.com](mailto:Jason@levinepstein.com)

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## Jason Mizrahi

---

**From:** Joshua Levin-Epstein  
**Sent:** Monday, March 22, 2021 3:32 PM  
**To:** Jason Mizrahi  
**Subject:** FW: RE: The Pullman Group, LLC v. Isley et al.

**Importance:** High

**Categories:** The Pullman Group LLC

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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---

**From:** Joshua Levin-Epstein  
**Sent:** Tuesday, December 22, 2020 4:39 PM  
**To:** [rwillls@rwillslawfirm.com](mailto:rwillls@rwillslawfirm.com)  
**Cc:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: The Pullman Group, LLC v. Isley et al.  
**Importance:** High

Dear Mrs. Wills:

Please let me know your availability for a discovery conference to discuss the scheduling of the Isley Defendants' depositions on a mutually agreeable date and time.

Thank you, in advance.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
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**Jason Mizrahi**

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**From:** Joshua Levin-Epstein  
**Sent:** Monday, March 22, 2021 3:32 PM  
**To:** Jason Mizrahi  
**Subject:** FW: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

**Categories:** The Pullman Group LLC

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Phone: (212) 792-0046  
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**From:** Joshua Levin-Epstein  
**Sent:** Wednesday, December 23, 2020 12:44 PM  
**To:** [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)  
**Cc:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Dear Mrs. Wills:

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Thank you, in advance.

Regards,

Josh

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Joshua D. Levin-Epstein, Esq.

Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
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**To:** [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)  
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**Subject:** RE: The Pullman Group, LLC v. Isley et al.  
**Importance:** High

Dear Mrs. Wills:

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Regards,

Josh

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## Jason Mizrahi

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**Sent:** Monday, March 22, 2021 3:32 PM  
**To:** Jason Mizrahi  
**Subject:** FW: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

**Categories:** The Pullman Group LLC

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Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Phone: (212) 792-0046  
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**From:** Joshua Levin-Epstein  
**Sent:** Wednesday, December 23, 2020 1:22 PM  
**To:** [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)  
**Cc:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Rhonda,

Happy holidays and happy new year.

January 5<sup>th</sup> at 3:00 p.m. EST works.

Thank you.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.

Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
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---

**From:** Rhonda Hunter Wills <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)>  
**Sent:** Wednesday, December 23, 2020 1:18 PM  
**To:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Cc:** [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com); [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Mr. Levin-Epstein, due to the holidays, I will not be available to confer until the week of January 4. During that week, my current earliest availability is January 5 from 3 pm - 7 pm ET. Let me know if that works for you. If not, please propose alternative dates/times later in the week. Also, please make sure that Patrick Raspino is also copied on all emails in this matter. His email address is [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com).

Regards,

Rhonda Wills

Rhonda Hunter Wills

Licensed in CA, TX & NY

Wills Law Firm, PLLC

1776 Yorktown, Suite 570

Houston, Texas 77056

Telephone: 713.528.4455

Facsimile: 713.528.2047

Email: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)

----- Original Message -----

Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

From: "Joshua Levin-Epstein" <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

Date: Wed, December 23, 2020 5:44 pm

To: "[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)" <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)>

Cc: "[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)" <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>

"Jason Mizrahi" <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>

> Dear Mrs. Wills:

>

> Please let me know your availability for a discovery conference to discuss the scheduling of the Isley Defendants' depositions on a mutually agreeable date and time.

>

> Thank you, in advance.

>

> Regards,

>

> Josh

>

>

>

> \_\_\_\_\_  
> Joshua D. Levin-Epstein, Esq.

> Levin-Epstein & Associates, P.C.

> 420 Lexington Avenue, Suite 2525

> New York, NY 10170

> Phone: (212) 792-0046

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From: Joshua Levin-Epstein

> Sent: Tuesday, December 22, 2020 4:39 PM

> To: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)

> Cc: [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>

> Subject: RE: The Pullman Group, LLC v. Isley et al.

> Importance: High

>

> Dear Mrs. Wills:

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> Thank you, in advance.

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> Regards,

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> Josh

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> \_\_\_\_\_

> Joshua D. Levin-Epstein, Esq.

> Levin-Epstein & Associates, P.C.

> 420 Lexington Avenue, Suite 2525

> New York, NY 10170

> Phone: (212) 792-0046

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## Jason Mizrahi

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**From:** Joshua Levin-Epstein  
**Sent:** Monday, March 22, 2021 3:32 PM  
**To:** Jason Mizrahi  
**Subject:** FW: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

**Categories:** The Pullman Group LLC

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Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
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**From:** Joshua Levin-Epstein  
**Sent:** Friday, January 15, 2021 4:12 PM  
**To:** praspino@rwillslawfirm.com; rwills@rwillslawfirm.com  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Rhonda,

As per our call this past Monday, please send a copy of the proposed protective order.

Please also let me know the Isleys' availability for a deposition.

Thank you.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.

Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
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**From:** Joshua Levin-Epstein  
**Sent:** Monday, January 11, 2021 6:05 PM  
**To:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)  
**Cc:** [rwillslawfirm.com](mailto:rwillslawfirm.com)  
**Subject:** Re: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Rhonda - please let me know if you need to reschedule. I was expecting your call. Thanks.

Sent from my iPhone

On Jan 7, 2021, at 4:14 PM, Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)> wrote:

Patrick,

Monday at 6:00 p.m. works. Please call me on my mobile at 516.343.0542.

We want to discuss the consolidation of the deposition into two dates, at a mutually date and time, as well as other discovery issues.

Thank you in advance.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)



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---

**From:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com) <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>  
**Sent:** Thursday, January 7, 2021 1:43 PM  
**To:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Cc:** [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Josh,

Are you available for a call on Monday at any time between 12:00 p.m. and 6:00 p.m. EST?

Thank you,

Patrick Raspino

Wills Law Firm, PLLC

----- Original Message -----  
Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.  
From: "Joshua Levin-Epstein" <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
Date: Tue, January 5, 2021 6:08 pm  
To: "[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)" <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>  
Cc: "[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)" <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)>  
"Jason Mizrahi" <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
-----

> Patrick,  
>  
> Please send my condolences to Rhonda.  
>  
> Regards,  
>  
> Josh  
>  
> \_\_\_\_\_  
> Joshua D. Levin-Epstein, Esq.  
> Levin-Epstein & Associates, P.C.  
> 420 Lexington Avenue, Suite 2525  
> New York, NY 10170  
> Phone: (212) 792-0046  
> Mobile: (516) 343-0542  
> Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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>

>

From: [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com) <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>

> Sent: Tuesday, January 5, 2021 12:45 PM

> To: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

> Cc: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>

> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>

>

> Josh,

>

> Rhonda's uncle passed away last night from COVID, and she is dealing with family matters. We will need to reschedule our call with you to later this week. We will be in touch.

>

> Thank you,

>

> Patrick Raspino

>

> Wills Law Firm, PLLC

>

> ----- Original Message -----

> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>

From: "Joshua Levin-Epstein" <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>>>

> Date: Wed, December 23, 2020 6:22 pm

> To: "[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>"

<[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>>

> Cc: "[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>>"

<[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>>>

> "Jason Mizrahi" <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com>>>

> -----

>

>> Rhonda,

>>

>> Happy holidays and happy new year.

>>

>> January 5th at 3:00 p.m. EST works.

>>

>> Thank you.

>>

>> Regards,

>>

>> Josh

>>

>>

>> Joshua D. Levin-Epstein, Esq.

>> Levin-Epstein & Associates, P.C.

>> 420 Lexington Avenue, Suite 2525

>> New York, NY 10170

>> Phone: (212) 792-0046

>> Mobile: (516) 343-0542

>> Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>>

>>

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>>

>>

>

From: Rhonda Hunter Wills <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>>

>> Sent: Wednesday, December 23, 2020 1:18 PM

>> To: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>>>

>> Cc: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>;

[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>>; Jason Mizrahi

<[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com>>>

>> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>>

>>

>> Mr. Levin-Epstein, due to the holidays, I will not be available to confer until the week of January 4.

During that week, my current earliest availability is January 5 from 3 pm - 7 pm ET. Let me know if that works for you. If not, please propose alternative dates/times later in the week. Also, please make sure that Patrick Raspino is also copied on all emails in this matter. His email address is

[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>><<mailto:praspino@rwillslawfirm.com>>  
[3cmailto:praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>>.

>>

>> Regards,

>>

>> Rhonda Wills

>>

>> Rhonda Hunter Wills

>>

>> Licensed in CA, TX & NY

>>

>> Wills Law Firm, PLLC

>>

>> 1776 Yorktown, Suite 570

>>

>> Houston, Texas 77056

>>

>> Telephone: 713.528.4455

>>

>> Facsimile: 713.528.2047

>>

>> Email:

[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com><<mailto:rwills@rwillslawfirm.com>%3c<mailto:rwills@rwillslawfirm.com>>>>>

>>

>>

>>

>>

>> ----- Original Message -----

>> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>>

>

From: "Joshua Levin-Epstein"

<[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com><<mailto:Joshua@levinepstein.com>%3c<mailto:Joshua@levinepstein.com>>>>>>

>> Date: Wed, December 23, 2020 5:44 pm

>> To:

"[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>><<mailto:rwills@rwillslawfirm.com>%3c<mailto:rwills@rwillslawfirm.com>>>>"

<[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com><<mailto:rwills@rwillslawfirm.com>%3c<mailto:rwills@rwillslawfirm.com>>>>>>

>> Cc:

"[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>><<mailto:praspino@rwillslawfirm.com>%3c<mailto:praspino@rwillslawfirm.com>>>>"

<[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com><<mailto:praspino@rwillslawfirm.com>%3c<mailto:praspino@rwillslawfirm.com>>>>>>

>> "Jason Mizrahi"

<[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com><<mailto:Jason@levinepstein.com>%3c<mailto:Jason@levinepstein.com>>>>>>

>> -----

>>

>>> Dear Mrs. Wills:

>>>

>>> Please let me know your availability for a discovery conference to discuss the scheduling of the Isley Defendants' depositions on a mutually agreeable date and time.

>>>

>>> Thank you, in advance.

>>>

>>> Regards,

>>>

>>> Josh

>>>

>>>

>>>

>>> \_\_\_\_\_  
>>> Joshua D. Levin-Epstein, Esq.

>>> Levin-Epstein & Associates, P.C.

>>> 420 Lexington Avenue, Suite 2525

>>> New York, NY 10170

>>> Phone: (212) 792-0046

>>> Mobile: (516) 343-0542

>>> Email:

[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com><<mailto:Joshua@levinepstein.com%3cmaito:Joshua@levinepstein.com>>>

>>>

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>>>

>>>

>>

>

From: Joshua Levin-Epstein

>>> Sent: Tuesday, December 22, 2020 4:39 PM

>>> To:

[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com><<mailto:rwills@rwillslawfirm.com%3cmaito:rwills@rwillslawfirm.com>>>

>>> Cc:

[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com><<mailto:praspino@rwillslawfirm.com%3cmaito:praspino@rwillslawfirm.com>>>; Jason Mizrahi

<[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com><<mailto:Jason@levinepstein.com%3cmaito:Jason@levinepstein.com>>>>

>>> Subject: RE: The Pullman Group, LLC v. Isley et al.

>>> Importance: High

>>>

>>> Dear Mrs. Wills:

>>>

>>> Please let me know your availability for a discovery conference to discuss the scheduling of the Isley Defendants' depositions on a mutually agreeable date and time.

>>>

>>> Thank you, in advance.

>>>

>>> Regards,

>>>

>>> Josh

>>>

>>>

>>> \_\_\_\_\_  
>>> Joshua D. Levin-Epstein, Esq.

>>> Levin-Epstein & Associates, P.C.

>>> 420 Lexington Avenue, Suite 2525

>>> New York, NY 10170

>>> Phone: (212) 792-0046

>>> Mobile: (516) 343-0542

>>> Email:

[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com><<mailto:Joshua@levinepstein.com%3cmaito:Joshua@levinepstein.com>>>

[o:Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>%3c<mailto:Joshua@levinepstein.com>%3c<mailto:Joshua@levinepstein.com>%3c<mailto:Joshua@levinepstein.com>>>>

>>>

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>

**Jason Mizrahi**

---

**From:** Joshua Levin-Epstein  
**Sent:** Monday, March 22, 2021 3:32 PM  
**To:** Jason Mizrahi  
**Subject:** FW: THIRD REQUEST The Pullman Group, LLC v. Isley et al.

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
60 East 42<sup>nd</sup> Street, Suite 4700  
New York, NY 10165  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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---

**From:** Joshua Levin-Epstein  
**Sent:** Tuesday, January 19, 2021 4:33 PM  
**To:** praspino@rwillslawfirm.com; rwillslawfirm.com  
**Subject:** RE: THIRD REQUEST The Pullman Group, LLC v. Isley et al.

THIRD REQUEST

Rhonda,

Please send a copy of the proposed protective order.

Please also let me know the Isleys' availability for a deposition.

Thank you.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.

Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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---

**From:** Joshua Levin-Epstein  
**Sent:** Friday, January 15, 2021 4:12 PM  
**To:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com); [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Rhonda,

As per our call this past Monday, please send a copy of the proposed protective order.

Please also let me know the Isleys' availability for a deposition.

Thank you.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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**From:** Joshua Levin-Epstein  
**Sent:** Monday, January 11, 2021 6:05 PM  
**To:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)  
**Cc:** [rwillslawfirm.com](mailto:rwillslawfirm.com)  
**Subject:** Re: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Rhonda - please let me know if you need to reschedule. I was expecting your call. Thanks.

Sent from my iPhone

On Jan 7, 2021, at 4:14 PM, Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)> wrote:

Patrick,

Monday at 6:00 p.m. works. Please call me on my mobile at 516.343.0542.

We want to discuss the consolidation of the deposition into two dates, at a mutually date and time, as well as other discovery issues.

Thank you in advance.

Regards,

Josh

---

Joshua D. Levin-Epstein, Esq.  
Levin-Epstein & Associates, P.C.  
420 Lexington Avenue, Suite 2525  
New York, NY 10170  
Phone: (212) 792-0046  
Mobile: (516) 343-0542  
Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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**From:** [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com) <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>  
**Sent:** Thursday, January 7, 2021 1:43 PM  
**To:** Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>  
**Cc:** [rwillslawfirm.com](mailto:rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
**Subject:** RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

Josh,

Are you available for a call on Monday at any time between 12:00 p.m. and 6:00 p.m. EST?

Thank you,

Patrick Raspino

Wills Law Firm, PLLC

----- Original Message -----

Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

From: "Joshua Levin-Epstein" <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

Date: Tue, January 5, 2021 6:08 pm

To: "[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)" <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>

Cc: "[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)" <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)>

"Jason Mizrahi" <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>

> Patrick,

>

> Please send my condolences to Rhonda.

>

> Regards,

>

> Josh

>

> \_\_\_\_\_

> Joshua D. Levin-Epstein, Esq.

> Levin-Epstein & Associates, P.C.

> 420 Lexington Avenue, Suite 2525

> New York, NY 10170

> Phone: (212) 792-0046

> Mobile: (516) 343-0542

> Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)

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>

From: [praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com) <[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>

> Sent: Tuesday, January 5, 2021 12:45 PM

> To: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)>

> Cc: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com); Jason Mizrahi <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)>  
> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.  
>  
>  
> Josh,  
>  
> Rhonda's uncle passed away last night from COVID, and she is dealing with family matters. We will need to reschedule our call with you to later this week. We will be in touch.  
>  
> Thank you,  
>  
> Patrick Raspino  
>  
> Wills Law Firm, PLLC  
>

> ----- Original Message -----

> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>  
From: "Joshua Levin-Epstein" <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>>>  
> Date: Wed, December 23, 2020 6:22 pm  
> To: "[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>"  
<[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>>  
> Cc: "[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>>"  
<[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>>>  
> "Jason Mizrahi" <[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com>>>  
> -----

>  
>> Rhonda,  
>>  
>> Happy holidays and happy new year.  
>>  
>> January 5th at 3:00 p.m. EST works.  
>>  
>> Thank you.  
>>  
>> Regards,  
>>  
>> Josh  
>>  
>> \_\_\_\_\_  
>> Joshua D. Levin-Epstein, Esq.  
>> Levin-Epstein & Associates, P.C.  
>> 420 Lexington Avenue, Suite 2525  
>> New York, NY 10170  
>> Phone: (212) 792-0046  
>> Mobile: (516) 343-0542  
>> Email: [Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>>

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>>

>>

>

From: Rhonda Hunter Wills <[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>>

>> Sent: Wednesday, December 23, 2020 1:18 PM

>> To: Joshua Levin-Epstein <[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com>>>

>> Cc: [rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>>;

[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>>; Jason Mizrahi

<[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com>>>

>> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>>

>>

>> Mr. Levin-Epstein, due to the holidays, I will not be available to confer until the week of January 4.

During that week, my current earliest availability is January 5 from 3 pm - 7 pm ET. Let me know if that works for you. If not, please propose alternative dates/times later in the week. Also, please make sure

that Patrick Raspino is also copied on all emails in this matter. His email address is

[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com><<mailto:praspino@rwillslawfirm.com>>>  
[3cmailto:praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)>>.

>>

>> Regards,

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>> Rhonda Wills

>>

>> Rhonda Hunter Wills

>>

>> Licensed in CA, TX & NY

>>

>> Wills Law Firm, PLLC

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>> 1776 Yorktown, Suite 570

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[3cmailto:rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)>>

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>> ----- Original Message -----

>> Subject: RE: SECOND REQUEST The Pullman Group, LLC v. Isley et al.

>>

>

From: "Joshua Levin-Epstein"

<[Joshua@levinepstein.com](mailto:Joshua@levinepstein.com)<<mailto:Joshua@levinepstein.com><<mailto:Joshua@levinepstein.com%3cmaito:Joshua@levinepstein.com>>>>

>> Date: Wed, December 23, 2020 5:44 pm

>> To:

"[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com>><<mailto:rwills@rwillslawfirm.com%3cmaito:rwills@rwillslawfirm.com%3e>>"

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>> Cc:

"[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com>><<mailto:praspino@rwillslawfirm.com%3cmaito:praspino@rwillslawfirm.com%3e>>"

<[praspino@rwillslawfirm.com](mailto:praspino@rwillslawfirm.com)<<mailto:praspino@rwillslawfirm.com><<mailto:praspino@rwillslawfirm.com%3cmaito:praspino@rwillslawfirm.com>>>>

>> "Jason Mizrahi"

<[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com><<mailto:Jason@levinepstein.com%3cmaito:Jason@levinepstein.com>>>>

>> -----

>>

>>> Dear Mrs. Wills:

>>>

>>> Please let me know your availability for a discovery conference to discuss the scheduling of the Isley Defendants' depositions on a mutually agreeable date and time.

>>>

>>> Thank you, in advance.

>>>

>>> Regards,

>>>

>>> Josh

>>>

>>>

>>> \_\_\_\_\_

>>> Joshua D. Levin-Epstein, Esq.

>>> Levin-Epstein & Associates, P.C.

>>> 420 Lexington Avenue, Suite 2525

>>> New York, NY 10170

>>> Phone: (212) 792-0046

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>>>

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>

From: Joshua Levin-Epstein

>>> Sent: Tuesday, December 22, 2020 4:39 PM

>>> To:

[rwills@rwillslawfirm.com](mailto:rwills@rwillslawfirm.com)<<mailto:rwills@rwillslawfirm.com><<mailto:rwills@rwillslawfirm.com%3cmailto:rwills@rwillslawfirm.com>>>>

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<[Jason@levinepstein.com](mailto:Jason@levinepstein.com)<<mailto:Jason@levinepstein.com><<mailto:Jason@levinepstein.com%3cmailto:Jason@levinepstein.com>>>>

>>> Subject: RE: The Pullman Group, LLC v. Isley et al.

>>> Importance: High

>>>

>>> Dear Mrs. Wills:

>>>

>>> Please let me know your availability for a discovery conference to discuss the scheduling of the Isley Defendants' depositions on a mutually agreeable date and time.

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>>> Thank you, in advance.

>>>

>>> Regards,

>>>

>>> Josh

>>>

>>>

>>> \_\_\_\_\_  
>>> Joshua D. Levin-Epstein, Esq.

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